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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**DECLARATION OF RACHEL B.
ABRAMS IN SUPPORT OF RESPONSE
TO ORDER REGARDING MOTION TO
DISMISS DUPLICATIVE CASES**

This Document Relates to:

K.L. v. Uber Technologies, Inc., et al;
3:25-cv-06178-CRB

I, Rachel B. Abrams, declare:

1. I am an attorney in the law firm of Peiffer Wolf Carr Kane Conway and Wise, LLP. I am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein:
2. On July 22, 2025, Plaintiff Jane Doe LS 618, through counsel at Levin Simes, LLP, filed a complaint alleging a driver on the Uber platform sexually assaulted or harassed her in Dallas, Texas, on July 29, 2023. *Complaint, Jane Doe L.S. 618 v. Uber Technologies, Inc. et al., No.3:25-cv-06160-CRB, ECF No. 1* (N.D. Cal. July 22, 2025).

3. One day later, on July 23, 2025, Plaintiff filed a second complaint relating to the same incident under a different pseudonym through counsel at Peiffer Wolf Carr Kane Conway & Wise. *Complaint, K.L. v. Uber Technologies, Inc. et al., No. 3:25-cv-06178-CRB, ECF No. 1* (N.D. Cal. July 23, 2025). Peiffer Wolf subsequently filed her Plaintiff Fact Sheet on August 21, 2025.
 4. On August 21, 2025, Uber notified Peiffer Wolf and Levin Simes that both firms filed claims on behalf of K.L.
 5. Peiffer Wolf reached out to Levin Simes multiple times in an effort to resolve this dual representation issue but did not get a response right away.
 6. Defendants filed a Motion to Dismiss Duplicative Cases on October 14, 2025.
 7. Plaintiff K.L. filed a Response to Defendants' Motion to Dismiss Duplicative Cases on October 28, 2025.
 8. After a discussion and confirming dual representation of Plaintiff K.L., on October 28, 2025, the firms resolved the dual representation issue, agreeing that Levin Simes will continue with their case, and Peiffer Wolf will dismiss their case on behalf of Plaintiff K.L.
 9. On November 5, 2025, Peiffer Wolf filed a notice of voluntary dismissal.
- Executed this day of December 19, 2025 in San Francisco, California.

/s/ Rachel B. Abrams

Rachel B. Abrams

Counsel for Plaintiff